

# **M. Premo-Hopkins Decl. Exhibit 14**

**From:** [Premo-Hopkins, Mark W.](#)  
**To:** [Roopal Luhana](#); [Sarah London](#); [Rachel Abrams \(Peiffer\)](#)  
**Cc:** [Vartain, Laura](#); [Larsen, Beth](#); [Fournier, Kristen](#); [Vives, Michael](#)  
**Subject:** Uber MDL - Protective Order Meet-and-Confer Follow-Up  
**Date:** Monday, August 11, 2025 6:06:00 PM

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Counsel –

Thank you for taking the time to discuss this issue with us further on our phone call yesterday afternoon. As explained on the phone, we have received from the New York Times confirmation that File and Serve was not the source of the sealed documents referenced in the August 6, 2025 story. Uber also is conducting its own investigation.

In order to avoid motion practice on this issue, Uber requests each of the plaintiffs' firms that had access to the relevant documents (not just the steering committee) conduct the following investigation and certify the following facts.

Please confirm by 5PM eastern time on Tuesday, August 12, whether there is any dispute.

\*\*\*\*\*INVESTIGATION FACTS TO BE CERTIFIED\*\*\*\*\*

1. I contacted each employee, contractor, consultant or agent (including expert witnesses) working with [INSERT FIRM NAME HERE], as well as any client who, based on a reasonable investigation, may have had access to the compilation of sealed documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs' summary judgment opposition in the JCCP.
2. Each of the individuals identified in paragraph 1 confirmed to me that they had not shared or in any way provided access, directly or indirectly, to any of the documents referenced in the Article to the New York Times or its agents, either directly or indirectly.  
OR
3. The investigation described in paragraph 1 revealed information concerning the source of this unauthorized disclosure to the New York Times and then describe the circumstances of such disclosure.

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